

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

OTO ANALYTICS, LLC,

Plaintiff,

vs.

Civil No. 23-01034 (GMM)

BENWORTH CAPITAL PARTNERS PR LLC,
BENWORTH CAPITAL PARTNERS LLC,
BERNARDO NAVARRO and CLAUDIA
NAVARRO,

Defendants.

FEDERAL RESERVE BANK OF SAN
FRANCISCO,

Plaintiff-Intervenor,

vs.

OTO ANALYTICS, LLC, BENWORTH CAPITAL
PARTNERS PR LLC, BENWORTH CAPITAL
PARTNERS LLC, BERNARDO NAVARRO and
CLAUDIA NAVARRO,

Defendants in Intervention.

**MOTION FOR EXTENSION OF TIME TO
ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT IN INTERVENTION**

TO THE HONORABLE COURT:

COMES NOW Plaintiff and Defendant in Intervention, Oto Analytics, LLC (“Womply”), through the undersigned counsel, and respectfully requests an extension of time to file its answer or otherwise respond to the Complaint in Intervention and in support therefore states and prays as follows:

1. On August 2, 2024, the Federal Reserve Bank of San Francisco (“Intervenor”) filed the Complaint in Intervention. (ECF No. 146.)

2. According to Federal Rule of Civil Procedure 12(a)(1)(A)(i), Womply’s deadline to respond to the Complaint in Intervention or otherwise defend currently expires on August 23, 2024.

3. Womply and its attorneys are currently in the process of investigating Intervenor's factual allegations and causes of action. To complete this investigation and responsibly prepare a responsive answer or otherwise respond to the Complaint in Intervention, Womply respectfully requests that the Court allow it an extension of time of an additional thirty days (30) days to answer or otherwise respond to the Complaint in Intervention. Because the thirtieth day is Sunday, September 22, 2024, Womply requests this extension to Monday, September 23, 2024, as allowed under Federal Rule of Civil Procedure 6(a)(1)(C).

4. This extension is sought in good faith and will not unreasonably delay the proceedings in this case.

WHEREFORE, Womply respectfully requests an extension of an additional thirty (30) days up to September 23, 2024, to answer or otherwise respond to the Complaint in Intervention.

Dated: August 13, 2024

Of Counsel

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Respectfully submitted,

By: /s/Alejandro J. Cepeda Diaz

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Attorneys for Plaintiff Oto Analytics, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that on August 13, 2024, the foregoing document was filed with the Clerk of the Court using CM/ECF, which sent notices to all parties receiving notifications through the CM/ECF system.

Dated: August 13, 2024

By: /s/ Alejandro J. Cepeda Diaz

Attorney for Plaintiff Oto Analytics, LLC